IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA **CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL 2327

ETHICON WAVE 4 CASES LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF THOMAS C. WRIGHT, M.D. FOR WAVE 4

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion filed against Thomas C. Wright for Ethicon Wave 1, Dkt. 1986 (motion), 1988 (memorandum in support). Plaintiffs respectfully request that the Court exclude Thomas C. Wright's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 4 cases identified in Exhibit A attached hereto.

Dated: April 13, 2017 Respectfully submitted,

> /s/ Michael H. Bowman Michael H. Bowman Wexler Wallace LLP 55 W Monroe Street, Suite 3300 Chicago, Illinois 60603 T. (312) 346-2222 F. (312) 346-0022 E. mhb@wexlerwallace.com

Bryan F. Aylstock, Esq. Renee Baggett, Esq. Aylstock, Witkin, Kreis and Overholtz, PLC 17 East Main Street, Suite 200 Pensacola, Florida 32563 T. (850) 202-1010 F. (850) 916-7449 E. rbaggett@awkolaw.com

Thomas P. Cartmell Wagstaff & Cartmell LLP 4740 Grand Avenue, Suite 300 Kansas City, MO 64112 T. 816-701-1102 F. 816-531-2372 E. tcartmell@wcllp.com

EXHIBIT A

| Plaintiff Name | Case No. |
|----------------------------|---------------|
| Baksic, Danielle and Brian | 2:12-cv-03536 |
| Cross, Kathy | 2:12-cv-02281 |

CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2017, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Michael H. Bowman
Michael H. Bowman
Wexler Wallace LLP
55 W Monroe Street, Suite 3300
Chicago, Illinois 60603
T. (312) 346-2222
F. (312) 346-0022
E. mhb@wexlerwallace.com